

**DECLARATION**

This affidavit is submitted in support of a complaint for forfeiture of \$40,640.00 in United States Currency seized on October 18, 2012.

I, Mark A Joyner., Special Agent of Homeland Security Investigations, submit that there are sufficient facts to support a reasonable belief that the \$40,640.00 in United States currency seized on October 18, 2012, constitutes property, real or personal, which constitutes or is derived from proceeds traceable to violations of 18 U.S.C. § 2342 (knowingly ship, transport, receive, possess, sell, distribute, or purchase contraband cigarettes). Thus, the \$40,640.00 in United States currency seized on October 18, 2012, United States Currency are subject to forfeiture pursuant to 18 U.S.C. § 981(a)(1)(C).

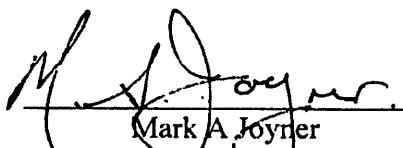
- a. On October 18, 2012, Senior Trooper Meyers of the Maryland State Police was stationary on US Rt. 113 south of MD Rt. 90 in Berlin, Worcester County, Maryland.
- b. Senior Trooper Meyers identified a 2008 Toyota Sienna, Virginia registration WZU2450, travelling southbound; Meyers activated the radar unit and obtained a steady speed of 63 miles per hour. .
- c. Based on the vehicle travelling 63 miles per hour in a posted 55 miles per hour zone. Meyers activated his emergency equipment and initiated a traffic stop on the vehicle.
- d. Meyers made contact with the sole occupant of the vehicle identified by his New York driver's license as Meng Yi WANG. Meyers advised WANG of the reason he stopped the vehicle. WANG provided Meyers with a New York license and a registration card. Meyers noticed the WANG provided a New York license with a New York address, but the vehicle was registered in Norfolk, VA.
- e. Norfolk is a common destination for the purchase of untaxed cigarettes.

- f. Senior Trooper Meyers noticed numerous water bottles on the floor and a large bag of edible seeds on the center console. Along with the seeds there were two cellular phones. Meyer's also noted of a multi-colored plastic bag and there were no seats in the rear of the vehicle, all indicative of the smuggling of cigarettes.
- g. Senior Trooper Meyers requested the assistance of TFC. Orndorff and his K-9 partner, Camo. Upon his arrival, Meyers advised TFC Orndorff of the above facts. Based on the observations made, a K-9 "free air sniff" was conducted by TFC Orndorff and Camo resulting in a positive alert for the presence of narcotics.
- h. A search of the vehicle was conducted with the following being located; in the inside pocket of the jacket lying on the passenger's seat was a large amount of US Currency held together with a rubber band. Behind the vehicles center console, lying on the passenger's floor was a plastic bag. Inside the plastic bag were two more large bundles of US Currency held together with rubber bands. Along with the two bundles of currency was a white pharmacy envelope containing US Currency.
- i. As the search continued, Meyer's located the following; eight cigarette carton tops, three suspected cigarette "shopping list" written in the Korean language; a large open box of black plastic trash bags, a red white and blue vinyl laundry bag, and a large black duffle bag. Meyers located several trash bags in the rear of the vehicle and noted the rear of the vehicle was free of any debris making a large storage area. All of the above were recognized by Meyer's training, knowledge, and personal experience to be indicative of cigarette smuggling.
- j. The currency was placed in Meyer's patrol vehicle; Meyer's asked WANG how much money he had; WANG replied "\$8,000." Meyer's advised WANG that based on all

the facts and information the money was to be seized. WANG was issued a warning for the speed violation, and was advised by Meyers to follow him to the Berlin Barrack for a receipt for the money seizure. WANG stated the money was for "Chinese Food" but left the scene without further questions.

- k. Once at the Berlin Barrack, Meyer's conducted a count of the money and found the total to be \$40,640.00 in US Currency.
- l. After the money was processed a woman called the Berlin Barrack on behalf of WANG requesting information regarding the seizure of WANG's money. Meyer's stated the reason why the money was seized; relating to the trafficking in contraband cigarettes. WANG, through the female stated the money was for "construction" not for "Chinese food" as he stated earlier on the traffic stop.
- m. The \$40,640.00 in United States currency was seized as proceeds traceable to trafficking in contraband cigarettes.

I DECLARE UNDER PENALTY OF PERJURY PURSUANT TO TITLE 28 U.S.C. 1746 THAT THE FACTS SUBMITTED BY THE MARYLAND STATE POLICE, IN REFERENCE TO THE SEIZURE OF \$40,640.00 IN UNITED STATES CURRENCY IS ACCURATE, TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.



\_\_\_\_\_  
Mark A. Joyner  
Special Agent  
Homeland Security Investigations